

**VENABLE**<sup>LLP</sup>

575 7th Street, NW  
Washington, DC 20004-3601

Telephone 202-344-4000  
Facsimile 202-344-8300

RECEIVED  
FEC MAIL  
OPERATIONS CENTER

www.venable.com

2004 DEC 20 A 11:05

Michael G. Roberts

202-344-4350

mgrroberts@venable.com

December 9, 2004

Ms. Maureen Benitz  
Senior Campaign Finance Analyst  
Reports Analysis Division  
Federal Election Commission  
Washington, DC 20463

Re: Crowley Maritime Corp. Federal PAC  
Identification Number: C00147231

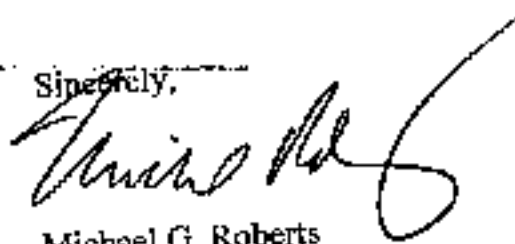
Dear Ms. Benitz:

We are in receipt of your letter dated November 10, 2004 (RQ-2, copy enclosed) to our treasurer, Albert Marucco, advising us that the October Monthly Report filing of Schedule B, Line 23 was in error because our contributions to various candidates were designated for the 2004 Primary Election instead of the General Election and the funds were disbursed after the election dates.

Per your telephone conversation on December 2, 2004 with Ashley Craig, he advised you that the filing was incorrectly disclosed and that we had notified the various campaign offices to be sure the contributions were designated to the General Election, which they were. We will therefore file an amended October filing designating the contributions to the General Election.

Should you have any questions, please feel free to contact me. Thank you for your assistance.

Sincerely,



Michael G. Roberts  
Assistant Treasurer for  
Crowley Maritime Corporation Federal PAC

MGR:veh  
Enclosures



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

November 10, 2004

RQ-2

Albert Marucco, Treasurer  
Crowley Maritime Corporation Federal PAC  
1909 K Street N.W.  
Suite 600  
Washington, DC 20006

Response Due Date:  
December 10, 2004

---

Identification Number: C00147231

Reference: October Monthly Report (9/1/04-9/30/04)

Dear Mr. Marucco:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **An adequate response must be received at the Commission by the response date noted above.** An itemization of the information needed follows:

-Schedule B supporting Line 23 of your report discloses one or more contributions to a candidate(s) for the 2004 Primary election; however, the funds were disbursed after the election date(s) (see attached). Please note that contributions may not be designated for an election which has already occurred unless the funds are to be used to reduce a candidate committee's debts incurred during that election campaign.

If any apparently impermissible contribution in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information. If the contribution(s) in question should have been designated for debt retirement, you should amend your report to indicate "debt retirement," along with the year of election.

If you have made an impermissible contribution, you must request a refund or provide a written authorization for a redesignation of the contribution pursuant to 11 CFR §110.2(b) within 60 days of the treasurer's receipt.

If the foregoing conditions for redesignations were not met within 60 days of the treasurer's receipt, your committee must obtain a refund.

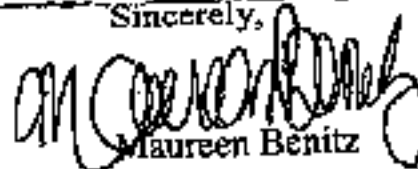
Please inform the Commission of your corrective action immediately in writing and provide a photocopy of the refund or redesignation request sent to the recipient committee(s). In addition, any refunds should be disclosed on Schedule A supporting Line 16 of the report covering the period during which they are received. Any redesignations should be disclosed as memo entries on Schedule B supporting Line 23 of the report covering the period during which the redesignation is made. 11 CFR §110.1(b)

Although the Commission may take further legal action regarding this impermissible activity, your prompt action in obtaining a refund and/or redesignating the contribution(s) will be taken into consideration.

**Unlike previous election cycles, you will not receive an additional notice from the Commission on this matter. Adequate responses received on or before this date will be taken into consideration in determining whether audit action will be initiated. Requests for extensions of time in which to respond will not be considered. Failure to provide an adequate response by this date may result in an audit of the committee. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action.**

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1135.

Sincerely,



Maureen Benitz

Senior Campaign Finance Analyst  
Reports Analysis Division

Recipient Name	Date	Amount	Election	Election State - Date
Abercrombie for Congress	9/29/04	\$1,000.00	P2004	HI - 9/18/04
Alaskans for Don Young	9/20/04	\$1,000.00	P2004	AK - 8/24/04
Friends of Barbara Boxer	9/29/04	\$2,500.00	P2004	CA - 3/2/04
Lisa Murkowski for U.S. Senate	9/8/04	\$1,000.00	P2004	AK - 8/24/04

**Hudak, Virginia E.**

---

**From:** Hudak, Virginia E.  
**Sent:** Friday, December 03, 2004 9:00 AM  
**To:** 'cliff@chpf.net'  
**Subject:** Returned PAC check for Cong. Neil Abercrombie

Per our phone conversation yesterday, I have spoken to the FEC and informed them that the error in the October filing was due to the contribution being categorized for the Primary Election instead of the General Election. And as I understand it, your campaign designated this check to the General Election. They therefore advised me that I need only send an amended report, so there is no need for the campaign to refund to the Crowley Maritime PAC the check we submitted to Cong. Neil Abercrombie dated September 29, 2004 in the amount of \$ 1,000.00. I will also fax this e-mail to Iris Osaki/Jack Endo.

Thank you. Ginny Hudak

---

Virginia E. Hudak  
Legal Administrative Assistant  
VENABLE LLP  
575 7th Street, N.W.  
Room E11010  
Washington, DC 20004-1601  
(202) 344-4365  
vehudak@venable.com

Hudak, Virginia E.

---

**From:** Hudak, Virginia E.  
**Sent:** Friday, December 03, 2004 8:55 AM  
**To:** 'mmaynard@alaska.com'  
**Subject:** FW: Returned PAC check for Cong. Don Young

Per my phone conversation yesterday with Jack Bonnard, I have spoken to the FEC and informed them that the error in the October filing was due to the contribution being categorized for the Primary Election instead of the General Election. And as I understand it, your campaign designated this check to the General Election. They therefore advised me that I need only send an amended report, so there is no need for the campaign to refund to the Crowley Maritime PAC the check we submitted to Cong. Don Young dated September 20, 2004 in the amount of \$ 1,000.00

Thank you. Ginny Hudak

---

Virginia E. Hudak  
Legal Administrative Assistant  
VENABLE LLP  
575 7th Street, N.W.  
Room E11010  
Washington, DC 20004-1601  
(202) 344-4365  
vehudak@venable.com

Hudak, Virginia E.

---

**From:** Hudak, Virginia E.  
**Sent:** Friday, December 03, 2004 2:22 PM  
**To:** 'shailac@boxer2004.org'  
**Cc:** 'andrew@boxer2004.org'  
**Subject:** PAC Check for Sen. Boxer

Per our phone conversation today, I have spoken to the FEC and informed them that the error in the October filing was due to a contribution being categorized for the Primary Election instead of the General Election. And as I understand it, your campaign has designated this check to the General Election. They therefore advised that I need only send an amended report, so there is no need for the campaign to refund to the Crowley Maritime PAC the check we submitted to Sen. Barbara Boxer dated September 29, 2004 in the amount of \$ 2,500.00.

Thank you. Ginny Hudak

---

Virginia E. Hudak  
Legal Administrative Assistant  
VENABLE LLP  
575 7th Street, N.W.  
Room E11010  
Washington, DC 20004-1601  
(202) 344-4365  
vehudak@venable.com

Hudak, Virginia E.

---

**From:** Hudak, Virginia E.  
**Sent:** Friday, December 03, 2004 8:57 AM  
**To:** 'cwthayer@alaska.com'  
**Subject:** Returned PAC check for Sen. Lisa Murkowski

Per our phone conversation yesterday, I have spoken to the FEC and informed them that the error in the October filing was due to the contribution being categorized for the Primary Election instead of the General Election. And as I understand it, your campaign designated this check to the General Election. They therefore advised me that I need only send an amended report, so there is no need for the campaign to refund to the Crowley Maritime PAC the check we submitted to Sen. Lisa Murkowski dated September 8, 2004 in the amount of \$ 1,000.00.

Thank you. Ginny Hudak


---

Virginia E. Hudak  
Legal Administrative Assistant  
VENABLE LLP  
575 7th Street, N.W.  
Room E11010  
Washington, DC 20004-1601  
(202) 344-4365  
vehudak@venable.com



Federal Election Commission  
**ENVELOPE REPLACEMENT PAGE  
 FOR INCOMING DOCUMENTS**

The FEC added this page to the end of this filing to indicate how it was received.

<input type="checkbox"/> Hand Delivered	Date of Receipt
<input checked="" type="checkbox"/> USPS First Class Mail	Postmarked 12/9/04
<input type="checkbox"/> USPS Registered/Certified	Postmarked (R/C)
<input type="checkbox"/> USPS Priority Mail	Postmarked
Delivery Confirmation™ Label <input type="checkbox"/>	
<input type="checkbox"/> USPS Express Mail	Postmarked
<input type="checkbox"/> Postmark Illegible	
<input type="checkbox"/> No Postmark	
<input type="checkbox"/> Overnight Delivery Service (Specify):	Shipping Date
<input type="checkbox"/> Received from House Records & Registration Office	Date of Receipt
<input type="checkbox"/> Received from Senate Public Records Office	Date of Receipt
<input type="checkbox"/> Received from Electronic Filing Office	Date of Receipt
<input type="checkbox"/> Other (Specify):	Date of Receipt or Postmarked
 PREPARER (5/2004)	12/20/04 DATE PREPARED